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VIA ECF

The Honorable Vera M. Scanlon United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Jane Doe v. St. John's University et al., Case No.: 18-cv-1733 (PKC)

Dear Judge Scanlon:

We represent Defendants St. John's University and Jackie Lochrie (collectively, "Defendants") in the above referenced matter. We write, jointly with Plaintiff's counsel, to provide a status update of the case, in preparation for the conference scheduled before Your Honor on December 3, 2018 and in response to the request for the parties to file a proposed scheduling order prior to the conference.

The parties have been working diligently to finalize the settlement agreement in this matter (which included some complicated terms) and expect to have the agreement executed within the next week or so. Therefore, we request a very brief adjournment of any further action in this matter in order to allow the parties to finalize the settlement agreement expeditiously.

If the Court is unable to briefly adjourn further action in this matter, the parties instead request that the Court reschedule the pre-motion conference regarding Defendants' request to move to dismiss the Complaint that was adjourned on June 1 *sine die*, pending the then anticipated mediation and possible settlement of this matter. As a result of Defendants' pending request to move to dismiss, the parties respectfully request an adjournment of the requirement to file a proposed scheduling order.

We thank the Court for its consideration.

Respectfully submitted,

Littler Mendelson, P.C.

/s/ Barbara A. Gross

Barbara A. Gross

cc: Ms. Allegra Fishel, Esq. (via ECF)

Ms. Iliana Konidaris, Esq. (via ECF)

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